

UNITED STATES DISTRICT COURT

for the
Middle District of North Carolina

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
Jan 1118
1101 Cedarview Trail
Winston Salem, NC 27105

Case No. *1:20mj80*

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

1101 Cedarview Trail Winston Salem, NC 27105 - See attachment A incorporated by reference herein.

located in the Middle District of North Carolina, there is now concealed (identify the person or describe the property to be seized):

See Attachment B incorporated by reference herein

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U.S.C. § 1708

Mail Theft

Offense Description

The application is based on these facts:

Please see attached affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Alberto Sanabria

Applicant's signature

Alberto Sanabria, United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: *3/5/2020 8:26 AM*

City and state: Durham, North Carolina

Joe L. Webster

Judge's signature

Joe L. Webster, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF ARREST WARRANTS AND SEARCH WARRANT

I, Alberto Sanabria, being duly sworn, declare and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS") currently domiciled in Greensboro, North Carolina and assigned to investigate financial crimes, including the investigation of mail theft. The pertinent statutes relating to such fraud include mail theft, in violation of Title 18, United States Code, Section 1708 (hereinafter, the SUBJECT OFFENSE).

2. I have been a United States Postal Inspector since August 2013. I have a master's degree in criminal justice and received formal classroom training from the USPIS during the twelve-week Postal Inspector Basic Training Academy in Potomac, Maryland. My previous law enforcement experience prior to USPIS was as a Law Enforcement Agent for the State of North Carolina License and Theft Bureau from 2012 to 2013 and as a Police Officer in the Town of Surfside Beach, South Carolina from 2010-2012.

3. This affidavit contains information necessary to support probable cause for the arrest warrant and criminal complaint charging DANIEL PERRY (collectively hereinafter, PERRY) and TIFFANY WESTMORELAND (collectively hereinafter, WESTMORELAND), with a violation of Title 18, United States Code, Section 1708 (Mail Theft).

4. Additionally, I make this affidavit in support of an application for a search warrant for the property located at 1110 Cedarview Trail, Winston Salem, NC 27105 (collectively hereinafter, the SUBJECT PREMISES). A detailed description and photographs of the locations are included in Attachment A, which is incorporated herein by reference. This affidavit states probable cause that evidence and property used and intended for use in the commission of a crime, and that constitutes criminal proceeds of the SUBJECT OFFENSES, as listed on Attachment B, will be found in 1110 Cedarview Trail, Winston Salem, NC 27105.

5. As described more fully below, I respectfully submit there is probable cause to believe that 1110 Cedarview Trail, Winston Salem, NC 27105, contains evidence, contraband, fruits, and instrumentalities in violation of the SUBJECT OFFENSE.

6. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. SUMMARY OF INVESTIGATION

7. In the course of my duties as a United States Postal Inspector with the USPIS, I have been conducting a criminal investigation into PERRY and WESTMORELAND for stealing U.S. Mail.

8. Beginning August of 2019, I began receiving numerous complaints from law enforcement officials and victims regarding mail being stolen from residential mailboxes in Forsyth and Stokes counties. The initial investigation revealed that checks were stolen from the mail and used, without the account holders' knowledge or authorization, to purchase numerous items. Additionally, debit cards and gift cards were stolen and fraudulently used to purchase items and services.

9. The investigation later revealed that PERRY and WESTMORELAND were involved in not only stealing items from the mail, but were involved in obtaining goods and services through a mail order scheme by using checks and checking account information stolen from the U.S. Mail.

MAIL THEFT INVESTIGATION

10. On or about August 5, 2018, I was contacted by detectives with the Stokes County Sheriff's Office about an investigation involving PERRY and WESTMORELAND being arrested for stealing mail. According to detectives, on August 2, 2019, at approximately 12:15 AM, a Stokes County Sheriff's Deputy observed a 2001 blue Ford Ranger truck pull-up to a residential mailbox on North Friendship

Road and remove items from the mailbox. The deputy initiated a traffic stop on the truck bearing North Carolina tag PKC4007, and determined that the occupants of the vehicle, PERRY and WESTMORELAND, were stealing mail. Deputies seized approximately 200 pieces of mail in the names of others, with roughly 30 pieces that were opened and rifled through.

11. I subsequently responded to the Stokes County Sheriff's Office and met with Detective Johnson and with Forsyth County Detective Faircloth. I examined all of the stolen mail and observed mail spanning from Forsyth County, NC to Stokes County, NC.

12. Forsyth County Detective Faircloth prepared a report listing all of the victims' mail that was recovered from the vehicle. Upon reviewing the list of victims, I noticed mail stolen from five victims living on the 6000 block of Providence Church Rd area in Winston Salem, NC.

13. On October 23, 2019, I received a mail theft complaint from a victim, whose initials are D.Y., alleging that mail was stolen from his residential mail receptacle located off Providence Church Road in Winston Salem, NC 27105.

14. D.Y. was first made aware of mail being stolen from D.Y.'s mailbox sometime in early August after D.Y.'s neighbor, whose initials are M.D., observed an individual in a white sedan pull-up to D.Y.'s mailbox and steal mail. D.Y. was expecting to

receive a rent check from a tenant during this time, but never received it. As a result of these incidents, D.Y. installed a camera facing the mailbox in an effort to video record the individual stealing mail from D.Y.'s mailbox.

15. On or about August 22, 2019, D.Y.'s video surveillance system recorded a white Pontiac Grand Am pull-up to the mailbox and observed an individual steal mail from D.Y.'s mailbox. D.Y. then showed the video surveillance images to M.D. M.D. said the vehicle belonged to Tiffany WESTMORELAND and provided D.Y. with WESTMORELAND's address, which is the SUBJECT PREMISES.

16. D.Y. then travelled to the SUBJECT PREMISES, and observed the white Pontiac Grand Am as well as a blue Ford Ranger truck, bearing NC tag PKC4007. D.Y. discovered that WESTMORELAND also lived with Daniel PERRY at the residence.

17. Between September of 2019 and December of 2019, D.Y. has captured PERRY pulling up to D.Y.'s mailbox while driving the white Pontiac Grand Am or the blue Ford Ranger, and stealing mail on over a dozen occasions.

18. On or about November 19, 2019, I prepared a test piece mailing where a traceable Target gift card was placed inside a greeting card and was mailed, via the US Postal Service, to D.Y. at D.Y.'s address off Providence Church Road in Winston Salem, NC. The Target gift card bearing card # 041-210-666-459-645, showed a face value of \$100, but actually contained a balance of \$10. I

subsequently contacted D.Y. and advised that a test piece mailing would be sent to D.Y.'s mailbox. I additionally described the test piece mailing to D.Y., in detail, and requested that D.Y. leave the test piece mailing inside his residential mailbox located off Providence Church Road.

19. On November 21, 2019, I was contacted by D.Y. and advised that the test mail piece had arrived at the mailbox. D.Y. confirmed that no one at the residence touched the test mail piece which was left inside the mailbox. On November 22, 2019, D.Y. told me that on the evening of November 21, 2019, the test mail piece was stolen from the mailbox. D.Y. provided video surveillance of PERRY pulling-up to the mailbox while driving a Ford Ranger and stealing mail from D.Y.'s mailbox. I was able to review the surveillance images and confirmed that PERRY was the individual who stole mail from D.Y.'s mailbox on November 21, 2019.

20. I determined that the stolen Target gift card was used at the Target Store located at 5420 University Parkway, Winston Salem, NC 27105, on November 23, 2019, to purchase \$3.18 worth of goods. Target asset protection representatives provided transaction data as well as surveillance video related to the transaction. I subsequently reviewed the surveillance video and observed the suspect on the video having unique physical characteristics similar to the ones found on PERRY. Specifically, the suspect in the video looks to have a large, stretched earlobe,

consistent with individuals who wear large gauge earrings and "plugs". PERRY's social media page and arrest photographs reveals that he also has large stretched earlobes and wears large gauge earrings. Additionally, video surveillance shows the suspect having hand tattoos that are consistent with the tattoos PERRY has on his hands and wrists.

FCSO UNDERCOVER MAIL THEFT ARREST

21. On December 9, 2019, I interviewed a victim of mail theft, whose initials are K.C., regarding mail that was stolen from the mailbox in front of K.C.'s residence located off of Phelps Circle, in Winston Salem, NC. To combat the theft, K.C. hired an off-duty deputy with the Forsyth County Sheriff's Office (FCSO) to conduct surveillance at K.C.'s residence as well as K.C.'s father's residence. K.C. additionally advised that as a result of the FCSO undercover surveillance activities, PERRY was caught actively stealing mail from the mailbox and subsequently arrested. K.C. additionally advised that K.C. did not know PERRY and never gave PERRY authorization to remove mail from the mailbox receptacle.

22. I then contacted FCSO Detective Christopher King to gather additional information regarding the investigation. King was actively investigating PERRY and WESTMORELAND for several incidents of mail theft in Forsyth County. When asked about the specific mail theft incident regarding K.C., King confirmed that

K.C. requested a FCSO deputy to conduct surveillance at K.C.'s father's residence located off Phelps Circle in Winston Salem.

23. On the evening of August 10, 2019, FCSO Detective Byerly went to 5925 Phelps Cir., Winston Salem, NC 27105 and conducted surveillance in an unmarked vehicle in an attempt to observe the suspect stealing mail. On August 11, 2019, at approximately 4:00 A.M., FCSO Detective Byerly observed a truck matching the suspect vehicle traveling east on Phelps Circle. The suspect driving the truck stopped at the mailbox located at 5915 Phelps Cir., Winston Salem, NC 27105 and removed several items. As the suspect began to pull away, Detective Byerly pulled out of the driveway and initiated a traffic stop. The driver was identified as Mr. Daniel Lewis Fowler, which is an alias for Daniel PERRY.

24. A probable cause search of PERRY and his vehicle was conducted. The search yielded over 30 pieces of mail from multiple addresses in Forsyth County. Detective Byerly seized the mail from the vehicle which was later determined to be stolen mail. PERRY was then transported to the Forsyth County Public Safety Center for an interview. On August 11, 2019, PERRY was read his constitutional rights and signed a waiver of same.

25. PERRY stated in the interview that he has been stealing mail for approximately 30 days in an attempt to find money, and admitted that taking the mail was stupid. PERRY additionally stated

that he was able to find cash inside of several pieces of mail in the past.

BATH AND BODY WORKS PURCHASES

26. FCSO Detective Christopher King additional information regarding WESTMORELAND and PERRY involved in stealing an elderly victim's debit card and using the debit card to withdraw money from Automated Teller Machines (ATM) at State Employees' Credit Union (SECU) branches as well as purchasing goods and services from merchants in Forsyth County. The victim, whose initials are L.T., had a debit card and approximately 200 blank checks stolen from L.T.'s residential mailbox. The debit card and checks were issued on a DC Teachers Federal Credit Union (DCTFCU) account opened by L.T. FCSO Detective Christopher King was made aware of the fraud after being contacted by DCTFCU investigators who suspected fraud on the account but were unable to get in contact with L.T.

27. On December 6, 2019, I spoke with L.T.'s niece, whose initials are C.D., regarding the fraud because she was assisting L.T. with the fraud. C.D. confirmed numerous purchases at merchants in Forsyth County and ATM transactions as being fraudulent. Two of the fraudulent purchases took place on August 31, 2019 at the Bath and Body Works store located at the Hanes Mall at 3320 Silas Creek Pkwy, Winston-Salem, NC 27103. Records show that L.T.'s

stolen DCTFCU debit card was used to make one purchase for \$73.87 and one purchase for \$61.92.

28. FCSO Detective Christopher King requested transaction details and surveillance video from Bath and Body Works related to the two fraudulent transactions. Video surveillance from the transaction show WESTMORELAND presenting the stolen DCTFCU debit card to purchase the items at Bath and Body Works.

FCSO TRAFFIC STOP AND DANIEL PERRY INTERVIEW

29. On December 6, 2019, at approximately 9:45 PM, I was contacted by Forsyth County Sheriff's Deputy M.D. Tuft regarding a traffic stop he was actively involved in where the occupants were in possession of stolen mail in Rural Hall, NC. Tuft identified the driver as WESTMORELAND and the passenger as PERRY. He further advised that the vehicle tag did not match PERRY's vehicle. It was later determined that the tag on the vehicle that WESTMORELAND was driving was actually stolen from a victim's mailbox and placed onto the vehicle. PERRY provided voluntary consent to allow Deputy Tuft to search the vehicle. Deputy Tuft located several pieces of mail in the truck that were later found to be stolen mail.

30. I responded to the area 6809 Pilot View Street, Rural Hall, NC and interviewed PERRY at approximately 10:30 PM. PERRY was not in custody when I began the interview. Additionally, I advised PERRY that he was not in custody, did not have to answer

any questions, and was free to leave at any time prior to starting the interview.

31. When asked if he wanted to discuss the investigation, PERRY responded by saying, "I take responsibility for everything". For informational purposes, I told PERRY that one of the items PERRY had previously stolen from the mail was a Target gift card that I had placed in the mail and was able to trace. I discussed how PERRY was identified as being the individual who ultimately redeemed the stolen gift card to purchase \$3.18 worth of goods from Target. When faced with this statement, PERRY nodded his head in agreement with me and confirmed his involvement by stating "yeah, yeah".

32. During the interview, PERRY admitted to stealing mail from residential mailboxes on numerous occasions. Specifically, PERRY admitted to stealing a debit card and the accompanying debit card personal identification number (PIN) from an individual and then using the debit card to withdraw funds from ATM's in Stokes County, NC. He also admitted to using the debit card at the ATM approximately 5-10 times. When asked about the video surveillance at *Bed, Bath, and Beyond* (Which your affiant incorrectly stated and should have been *Bath and Body Works*) and the ATM which showed WESTMORELAND using the debit card, PERRY responded by saying, "she did that, but it was my doing". He further stated that he was the one who obtained the card, but WESTMORELAND followed his lead when

it came to using the card. He elaborated and stated that, "She [WESTMORELAND] said she didn't feel comfortable doing it and probably shouldn't do it" and stated that WESTMORELAND was present with him. He additionally mentioned that she's guilty for using the card. He advised that the debit card associated with the SECU account (which is actually the DCTFCU debit card used to withdraw funds from the SECU atm) was the only card he was able to successfully use since he had the PIN associated with the card.

33. PERRY was unable to provide an exact figure on the amount of mail he had stolen. When asked if he could have stolen 200 pieces of mail, PERRY responded by saying "maybe". He also stated that he stopped stealing mail for approximately one month and then began stealing mail approximately one week ago. When asked how many times PERRY had stolen checks from King, NC, he responded by saying "not a lot". He denied ever using any checks stolen from King, NC to purchase goods.

34. PERRY did admit to stealing approximately \$100 in cash from the mail. He also stated that after stealing the mail, he would secure the open mail and return it back to the mail stream to be delivered. He additionally stated that he also threw away some of the mail he stole in the garbage at his residence.

35. When asked about the stolen mail pieces he was currently in possession of, PERRY was unable to provide an answer as to how he came to possess those items.

STOLEN CHECKS, CHECKING ACCOUNT INFORMATION, and MAIL ORDER
FRAUD INVESTIGATION

36. Upon inspecting the stolen mail PERRY was in possession of during the August 11, 2019, traffic stop (referenced in ¶22 and ¶23), I observed two mail pieces that had not been processed through the United States Postal Service, but did have a stamp and sender/addressee addresses on them. I noticed that both of the mail pieces had a return address of the SUBJECT PREMISES, but had the names of other individuals listed as the senders. The addressee information was listed as "PCS, PO Box 768, Newark, NJ 07101-0768".

37. "PCS", or PCS Stamps and Coins, is an online and mail-order company that sells collectible coins and stamps. I contacted PCS representatives regarding the mailings and asked if they have recently received any orders containing stolen/fraudulent checks associated with PERRY, WESTMORELAND, and/or the SUBJECT PREMISES. The PCS representative confirmed that PCS had previously received mail orders containing fraudulent checks which had the SUBJECT PREMISES listed as the shipping address. Prior to discovering the fraud, PCS fulfilled orders and sent items to the SUBJECT PREMISES and ultimately incurred a loss as a result.

38. On February 11, 2020, I received a complaint related to checks and checking account information stolen from numerous residents in Forsyth County. The complaint revealed that between

the dates of March 2019 to December 2019, over 40 fraudulent checks were sent to Skyline Coins and Currency, an online and mail-order merchant that sells precious metals and currency. I contacted Skyline and they confirmed the orders were placed using stolen checks or checks fraudulently created using the victim's banking information. The majority of the orders had a shipping address that was different from the victim address listed on the checks.

39. I discovered that 20 of the orders had the same shipping address of 1110 Cedarview Trail, Winston Salem, NC 27105, which is the SUBJECT PREMISES.

40. Skyline confirmed that prior to discovering the fraud, they shipped three orders to the SUBJECT PREMISES, via US Mail.

III. STATEMENT OF PROBABLE CAUSE TO SEARCH SUBJECT PREMISES

41. During the course of this investigation, numerous records and witness testimony show that the primary residence for PERRY and WESTMORELAND is 1110 Cedarview Trail, Winston Salem, NC 27105, the SUBJECT PREMISES. Surveillance conducted on March 3, 2020, by your affiant, revealed that both vehicles owned and driven by WESTMORELAND and PERRY, and used in the fraud scheme, were parked in front of the SUBJECT PREMISES.

42. During PERRY's interview on December 6, 2019, he admitted that after stealing mail from others, he would return to his residence, the SUBJECT PREMISES, and dispose of stolen mail matter in the garbage at his residence.

43. As part of the investigation, I cross-referenced all of the victims who had their checks and/or checking account information stolen to purchase items through Skyline Coins and Currency (referenced in ¶'s 37-39) with the stolen mail that PERRY and WESTMORELAND were found to be in possession of during the August 2, 2019, traffic stop (referenced in ¶'s 9-11).

44. I discovered that on the August 2, 2019, traffic stop, PERRY and WESTMORELAND were in possession of stolen mail pieces from a victim residing in Pfafftown, NC who initials are E.P. A review of the Skyline check fraud records showed that on or about October 4, 2019, a fraudulent check in the amount \$402.00 was written on the checking account of E.P. and sent to Skyline Coins and Currency with an accompanying order form to purchase currency. The check was completed and signed with the name E.P. E.P. confirmed that E.P. was a victim of identity theft and never wrote a check to Skyline Coins and Currency. The shipping address on the order form was listed as the SUBJECT PREMISES. According to Skyline representatives, the items were shipped, via the US Mail, to the SUBJECT PREMISES shortly after receiving the order form.

45. Representatives from Skyline Coins and Currency additionally noted that on February 8, 2020, an online request for a Skyline Coin and Currency printed catalog was received. The online request listed the requestor name as Daniel PERRY with the shipping address on the request as the SUBJECT PREMISES.

Furthermore, Skyline representatives provided a previous online request for a catalog that was submitted on March 27, 2019. The catalog requestor on this request was Tiffany WESTMORELAND, with a shipping address listed as the SUBJECT PREMISES.

46. On March 2, 2020, Inspector Sanabria interviewed the witness whose initials are M.D. (referenced in ¶13). M.D. periodically visits WESTMORELAND and PERRY at the SUBJECT PREMISES. M.D. advised that on or about July or August of 2019, M.D. observed a stack of mail located on the top of the kitchen stove inside of the SUBJECT PREMISES that was in the name of another person. Specifically, M.D. recalls that the mail was from the disability office and was addressed to a female who was not WESTMORELAND. Furthermore, it was around this same time frame that M.D. also observed a large quantity of goods from Bath and Body Works that WESTMORELAND possessed (referenced in in ¶'s 25-27). According to M.D., WESTMORELAND said she purchased the items herself using gift cards and coupons.

47. M.D. additionally confirmed that WESTMORELAND and PERRY currently reside at the SUBJECT PREMISES and had visited both individuals at the residence approximately two weeks prior to being interviewed. During the most recent visit, M.D. noticed a new DeWalt saw that had just been removed from the box. M.D. additionally observed several items inside the SUBJECT PREMISES, such as a TV, that were valuable and brand new. M.D. believed

that WESTMORELAND and PERRY obtained these items through illegitimate means because neither of them have jobs.

48. Based on my training and experience, it is likely that stolen mail matter, checks, fraudulently purchased items, and other evidence related to the aforementioned scheme are present at the SUBJECT PREMISES.

49. Additionally, based on my training and experience, electronic devices containing digital records associated with the previously mentioned Skyline Coins and Currency online catalog request are likely to be maintained on electronic devices at the SUBJECT PREMISES.

IV. CONCLUSION


50. Based upon my training and experience and the investigation described above, I submit that there is probable cause to believe that Daniel PERRY and Tiffany WESTMORELAND have violated the criminal statute listed above and that evidence, fruits, and instrumentalities of these crimes as described in Attachment B are contained within 1110 Cedarview Trail, Winston Salem, NC 27105, described in Attachment A.

Respectfully submitted,



Alberto Sanabria
Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me this the 5th day of March,
2020. 8:26 AM



HONORABLE Joe L. Webster
United States Magistrate Judge

ATTACHMENT A1

PROPERTY TO BE SEARCHED

1. This warrant applies to items and information associated with the 1110 Cedarview Trail, Winston Salem, NC 27105

2. 1110 Cedarview Trail can be further described as:

A one-story single mobile home with white-colored siding, brick foundation, green shutters, white front door with an attached storm door, and black shingled roof. The front of the SUBJECT PREMISES, when viewed from Cedarview Trail, has stairs leading to a small front porch with railings.

Photos of 1110 Cedarview Trail are included below:



ATTACHMENT B

ITEMS AT PREMISES TO BE SEIZED BY THE GOVERNMENT

The items to be seized are evidence of violations of Title 18, United States Code, Section 1708 (Mail Theft), in the form of:

1. Documents, photographs, and information which tend to show possession, dominion, and control over 1110 Cedarview Trail.

2. All records and items which constitute evidence of person(s) committing the SUBJECT OFFENSE.

3. All records related to any mail-order purchases facilitated through stolen checks and/or stolen checking account information

4. Stolen mail, stolen checks, or any other documents associated with the scheme

5. All collectible coins, collectible stamps, collectable currency, and precious metals believed to have been purchased through the use of stolen checks and/or stolen checking account information

6. Any contraband seen during the search.

7. Any laptop computers, desk top computers, electronic tablets, smart mobile telephones, and any other devices capable of accessing websites for the purpose of committing the SUBJECT OFFENSE ("ELECTRONIC DEVICES").

ELECTRONIC DEVICES

Authorization is sought to search for and seize evidence that depicts violations of the SUBJECT OFFENSE such as those items reflected above. Authorization to search includes any detached structures from 1110 Cedarview Trail if such additional structures

exist. This authorization includes the search of physical documents and electronic data (to include deleted data, remnant data and data in slack space) in the form of:

i. Computer systems, software, peripherals and data storage devices.

ii. User-attribution data reflecting who used or controlled the computer or electronic storage device at or around the time that data reflecting criminal activity within the scope of this warrant was created, accessed, deleted, modified, copied, downloaded, uploaded or printed. User-attribution data includes registry information, computer logs, user profiles and passwords, web-browsing history, cookies, electronic mail stored on the computer or device, electronic address books, calendars, instant messaging logs, electronically stored photographs and video, file structure and user-created documents, including metadata.

iii. Cellular telephones and any associated storage devices, such as SIM cards or flash memory devices attached to, inserted in or seized with the device, to the extent that any such device contains or depicts evidence of violations of the SUBJECT OFFENSE, including evidence reflecting dominion and control of the device:

- a. All telephone numbers and direct-connect numbers or identities assigned to the device;
- b. Call and direct connect history information;
- c. Telephone book or list of contacts; and,
- d. Stored photographs, videos and text messages.

As such, it is respectfully requested that trained computer forensic analysts of the United States Postal Inspection Service and other law enforcement agencies be granted authority to search and examine the cellular telephones, the hard drives of the aforementioned personal computers, and any peripheral digital storage devices, including USB (Universal Serial Bus) connected portable storage devices.